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September 28, 2023

Re: *Gera v. UiPath, Inc., et al.*, 1:23-cv-07908-DLC

The Honorable Denise Cote  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Dear Judge Cote:

We represent UiPath, Inc. (“UiPath”), Daniel Dines, and Ashim Gupta (collectively, “Defendants”) in the above-referenced action. Pursuant to Rule 1(E) of the Court’s Individual Practices in Civil Cases, we write to request an extension of time for our clients to answer or otherwise respond to the putative class action complaint (the “Complaint”) (ECF No. 1) as described below.

On September 6, 2023, Plaintiff commenced this case by filing the Complaint. On September 20, 2023, Plaintiff sent Defendants requests to waive the service of the summons and complaint. Defendants waived service of the summons and Complaint on September 27, 2023 and their deadline to answer or otherwise respond to the Complaint is currently November 19, 2023 under Federal Rule of Civil Procedure 4(d)(3).

This case is a putative class action, and the Complaint asserts federal securities claims that are governed by the Private Securities Litigation Reform Act of 1995 (“PSLRA”). See 15 U.S.C. § 78u-4 *et seq.* As reflected in the Court’s September 7, 2023 order (ECF No. 7), the PSLRA provides putative members of the class an opportunity to file motions to serve as lead plaintiff and lead counsel of the purported class within sixty days of notice of the action being published. See 15 U.S.C. §78u-4(a)(3). The Court has set the deadline for such motions in this action for November 5, 2023. See ECF No. 7 at 2. Because the party appointed as lead plaintiff may wish to file a consolidated or amended complaint, which would supersede the Complaint, Defendants respectfully request an adjournment of any deadline to answer or otherwise respond to the Complaint until after the Court appoints a lead plaintiff and lead counsel.

Subject to the Court’s approval, Plaintiff and Defendants have agreed that within fourteen days after the entry of an order by the Court appointing a lead plaintiff and lead counsel, counsel for defendants will meet and confer with lead counsel regarding a proposed schedule for the filing of any consolidated or amended complaint and for moving to dismiss (or otherwise responding to) the operative complaint. This agreement is subject to Defendants’ express reservation of all rights, defenses or other objections (other than insufficient service of process), and without prejudice to any party seeking further extensions from the Court.

This is the first request to the Court by these defendants for an extension of time to answer or otherwise respond to the Complaint. Plaintiff agrees to the requested extension.

In light of the foregoing, we respectfully request that the Court grant this letter motion to extend the time for Defendants to answer or otherwise respond to the Complaint as set forth above.

**DavisPolk**

The Honorable Denise L. Cote

Respectfully submitted,

/s/ Edmund Polubinski

Edmund Polubinski

cc: All counsel of record

**Via Electronic Filing**